

July 15, 2013

**VIA E-MAIL DOCKET@ENERGY.
CA.GOV**California Energy Commission
Dockets Office, MS-4
Re: Docket No. 13-IEP-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 2013 Integrated Energy Policy Report Update: Reply Comments of Pacific Gas and Electric Company to Petitioners' Request for the California Energy Commission to Perform a Societal Benefit Analysis of Net Energy Metering

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide brief reply comments on the June 5, 2013 "Petition for Societal Cost-Benefit Evaluation of California's Net Energy Meter Program" (Petition). The Commission received numerous opening comments on the Petition, and PG&E's opening comments¹ addressed many of these issues raised by parties on whether the CEC should perform a societal benefit analysis of Net Energy Metering (NEM).

No party has presented any overwhelming evidence that would require the CEC to take up this issue on an expedited basis, as requested by the petitioners. In fact, comments filed by the Division of Ratepayer Advocates echo points made by PG&E that the CPUC has already considered many of the same issues and claims, and concluded that many of these claimed benefits should not be included in the analysis either because the benefits and costs: do not exist, cannot be quantified at this time, or are already included elsewhere (*e.g.*, in the avoided energy and capacity values).²

Accordingly, for the reasons set forth in PG&E's June 28 comments, PG&E respectfully requests that the CEC decline to add this Petition to the already extensive list of topics scheduled for the 2013 IEPR. Please feel free to contact me with any questions you may have.

¹ Winn, V. J. (2012). Response of Pacific Gas and Electric Company to Petitioners' Request for the California Energy Commission to Perform a Societal Benefit Analysis of Net Energy Metering. Pacific Gas and Electric Company. Retrieved from http://www.energy.ca.gov/2013_energypolicy/documents/Petition_for_Societal_Public_Comments/Response_of_PG_and_E_to_Petitioners_Request_for_the_CEC_to_Perform_a_Societal_Benefit_Analysis_of_Net_Energy_Metering_2013-06-28_TN-71475.pdf

² Campbell, M. (2013, June 28). Comments on Petition for Societal Cost-Benefit Evaluation of California's Net Energy Metering Program. Retrieved from http://www.energy.ca.gov/2013_energypolicy/documents/Petition_for_Societal_Public_Comments/Division_of_Rate_Payor_Advocates_CPUC_Comments_re_Petition_for_Societal_Cost-Benefit_Evaluation_of_California's_Net_Energy_Meterin_2013-06-28_TN-71470.pdf

PG&E Reply Comments on *Societal Benefit Analysis of NEM*
July 15, 2013
Page 2

Sincerely,

/s/

Valerie J. Winn

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